



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
Underground Storage Tanks Program Office  
75 Hawthorne Street (WST-8)  
San Francisco, CA 94105

INTERNAL MEMORANDUM  
MEMO TO FILE

FROM: Chris Prokop *Chris Prokop*  
TO: File for the Tribal Maintenance Yard in Whiteriver, AZ (WMAF-028)  
SUBJECT: Administrative No Further Action (NFA)  
DATE: February 15, 2011

This memorandum documents the administrative closure of the non-operating underground storage tank (UST) facility at the Tribal Maintenance Yard, located at the corner of North Leach Street and North 1<sup>st</sup> Street in Whiteriver, AZ, on land of the White Mountain Apache Tribe. This administrative closure is supported by the information described in the next section that was obtained by me during:

- My file review.
- My two visits to the facility.
- My interviews with staff from the Tribal Public Works Office (TPWO), the Tribal Environmental Protection Office (TEPO), and the BIA.

**Site background and information supporting the administrative closure of the Tribal Maintenance Yard UST Facility**

- The undated and unsigned UST notification form for this facility listed one "currently in use" 500 gallon gasoline UST, and one "permanently out of use" 500 gallon diesel UST, both reportedly installed in 1980. The UST notification form did not list the location of the UST facility.
- On 12/3/99, Kirk Massey, formerly with the Tribal EPO, sent a fax to EPA listing all of the non-operating UST facilities on White Mountain Apache Land that he was aware of. Mr. Massey's list did NOT include the Tribal Maintenance Yard.
- During my first site visit on 6/6/07, I did a thorough reconnaissance of the facility and interviewed two senior staff with the TPWO. I observed no evidence of a current or former UST system at the facility (i.e., fill ports, vent lines, dispenser islands, etc.). In addition, Leonard Palmer (Maintenance Director, now retired) and Albert Brooks, both with the TPWO, stated that they had never seen USTs at this facility (only two ASTs). Mr. Palmer said he had worked for the TPWO since 1977, which was 3 years prior to the reported date of the UST installations. As such, Mr. Palmer would have been aware of the UST installations if they had occurred.
- During my second visit to this site on 6/18/10, I again did a reconnaissance of the facility

and observed no evidence of a current or former UST system. In addition, I asked Delbert Altaha of the TEPO (a life-long resident of Whiteriver) if he remembered any USTs at this facility. Delbert replied that he could not remember any USTs at this site.

- On 8/18/10, I finalized my letter to Tribal Chairman Lupe (signed by Steve Linder for Carl Warren) regarding my recommendations that three Tribal UST facilities be considered for closure (the Tribal Maintenance Yard was included in this letter). On 9/17/10, Brenda Begay, Manager of the TEPO, replied in her letter to me that the Tribe supported the closures of these three facilities based on the new information in my 8/18/10 letter to the Chairman.
- On 2/14/11, I called Albert Brooks of the TPWO to confirm his statements to me during my 6/6/07 site visit. Mr. Brooks reiterated that he never saw USTs at this facility. Mr. Brooks said this facility was formerly managed by BIA's Forestry office in Whiteriver, prior to the Tribe taking over the facility. Mr. Brooks added that he thought the facility was being considered for preservation by the Tribe's Historic Preservation Office.
- On 2/14/11, in follow-up to Mr. Brooks' comments, I called the BIA in Whiteriver and spoke with Floyd Massey with BIA's Property Management unit. Mr. Massey said he began working for BIA's Roads unit in 1971-2, and noted that he never saw USTs at the former BIA Forestry building (Building 93 - called the "Tribal Maintenance Yard" in USTRAC), or at the adjacent BIA Roads complex (Building 92) and BIA vehicle storage shed (Building 91). Mr. Massey said BIA's Forestry and Roads buildings were built in 1936 and probably given to the Tribe in the mid-1970s. I asked Mr. Massey if there were any other former BIA maintenance facilities in Whiteriver (other than WMAP-023, located just east of FATCO), and Mr. Massey said there were NO other maintenance facilities to his knowledge. Mr. Massey thought the BIA Forestry and Roads units had purchased fuel from local suppliers.
- On 2/15/11, Delbert Altaha emailed me (at my request) photos showing an old diesel above-ground storage tank (AST), and notes from his interview with a Tribal elder (Mr. Albert) confirming that only a diesel AST was used at the Tribal Maintenance Yard. Delbert's notes also state that the facility purchased gasoline at a local gas station.
- The Tribal Maintenance Yard (formerly operated by BIA Forestry) is currently an unused, fenced compound with a locked gate. Based on my discussion with Terry Hill of the TEPO, the nearest active Tribal drinking water wells are many miles north of this facility in Minor Flats.

### Conclusion

Based on the information described above, it appears that the undated and unsigned UST notification form for this facility, which also lacked even a basic location description for the USTs, was erroneous, or pertained to another currently unknown facility. It is also possible that the UST notification form was mistakenly submitted to address the two ASTs that were formerly in use at the facility. Based on the information described above, EPA Region 9 is administratively closing this facility.

*Chris Prokop, 2/15/11*

Chris Prokop, Hydrogeologist  
Tribal LUST Program

*Carl Warren, 2/15/2011*

Carl Warren, Supervisor  
Tribal LUST Program